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GARY A. PULVER
dba PULVER CONSTRUCTION COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GARY A. PULVER dba PULVER
CONSTRUCTION COMPANY, an individual,

Plaintiff,

v.

BARRY KANE, an individual; ANNA KANE, an
individual; and 1059 LAKESHORE BOULEVARD
LLC, a Nevada limited liability company fka 1059
Lakeshore Drive LLC,

Defendants.

1059 LAKESHORE BOULEVARD LLC, a
Nevada limited liability company,

Counterclaimant,

v.

GARY A. PULVER dba PULVER
CONSTRUCTION COMPANY, an individual,
and ROES 1-50, inclusive,

Counter-Defendants.

Case. No.: 3:20-cv-00673-MMD-
CLB

Honorable Miranda M. Du

JOINT MOTION TO EXTEND
DISCOVERY DATES
[Second Request]

[Fed. R. Civ. P. 26] [LR 26-3] [LR 6-1]

GARY A. PULVER dba PULVER
CONSTRUCTION COMPANY, an individual,

Third-Party Plaintiff,

vs.

CRUZ CONSTRUCTION COMPANY, INC., a
Nevada corporation; CLASS A ROOFING, LLC,
a Nevada limited liability company; A & E
ARCHITECTS, a Montana professional corporation;
RENO TAHOE GEO ASSOCIATES, INC., a
Nevada corporation; ERIC'S CONCRETE
PAVERS, INC., a Nevada corporation;
JULIAN MACDONALD dba JP MCDONALD
MILLWORKS; and DOES 1 through 20,

Third-Party Defendants.

JOINT MOTION TO EXTEND DISCOVERY DATES

[Second Request]

[Fed. R. Civ. P. 26] [LR 26-3] [LR 6-1]

Pursuant to Fed. R. Civ. P. 26, LR 26-3, and LR 6-1, Plaintiff/Counter-Defendant/Third-Party Plaintiff GARY A. PULVER dba PULVER CONSTRUCTION COMPANY ("Pulver"), by and through its counsel of record LEMONS, GRUNDY & EISENBERG, Defendants BARRY KANE and ANNA KANE (*collectively* "Kanes") and Defendant/Counterclaimant 1059 LAKESHORE BOULEVARD, LLC ("Lakeshore") by and through their counsel of record MOUNTAINSIDE LAW, and Third-Party Defendant CRUZ CONSTRUCTION COMPANY, INC. ("Cruz") by and through its counsel of record ERICKSON THORPE & SWAINSTON, hereby jointly move for an extension of the discovery deadlines originally set forth in the *Joint Motion to Extend Discovery Dates [First Request]* [ECF No. 21, p. 8:1-4] filed June 14, 2021, and subsequently approved by the Court in its *Scheduling Order Granting Motion to Extend Time* [ECF No. 33] dated July 15, 2021.

This Motion is made pursuant to Fed. R. Civ. P. 26, LR 26-3, and LR 6-1, and is based on the following memorandum of points and authorities, the pleadings and papers on file herein, argument taken at the hearing of this matter, if any, and such other matters as the Court deems appropriate to consider.

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

All parties continue to cooperate and collaborate in the discovery process in this complex construction defect lawsuit. On June 14, 2021, the parties filed a *Joint Motion to Extend Discovery Dates [First Request]* [ECF No. 21]. At that time, the parties (Pulver, Kanesh, Lakeshore, and Cruz) had actively engaged in initial written discovery, conducted a site inspection, and developed a protocol for discovery pertaining to ESI including the retention of a joint forensic electronic discovery technical and consulting service to gather ESI and assist with document control. The Court granted the *Joint Motion to Extend Discovery Dates [First Request]* on July 15, 2021. [ECF No. 33].

Since that time, the parties have utilized the jointly developed ESI protocol to produce, process, and review hundreds of thousands of pages of documents in digital format and conducted multiple expert inspections of the subject real property. To date, the parties have deposited into the document depository 7,277 electronic files containing 12.2 GB of data. Unfortunately, technical issues have prevented Pulver and Cruz from accessing files deposited into the document repository by Lakeshore with its *Second Supplemental FRCP 26(a)(1) Disclosures of Defendant and Counterclaimant 1059 Lakeshore Boulevard LLC and Defendants Barry Kane and Anna Kane*, on December 17, 2021, which was already understandably delayed by five months due to (1) a personal tragedy experienced by counsel for Lakeshore, and (2) the volume of documents to be reviewed by Lakeshore's counsel for applicable privileges. The parties are currently collaborating to resolve the inability to access Lakeshore's recently produced ESI.

The complications in accessing files deposited by Lakeshore did not prevent Pulver from utilizing other information discovered from the extensive document production and expert site inspections to prepare and file *Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint* [ECF No. 40], in which Pulver names five additional entities as third-party defendants. Prior to filing *Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint*, Pulver retained and consulted with qualified experts to obtain required certificates of merit against the two design professionals named in *Gary A. Pulver dba Pulver*

1 *Construction Company's Amended Third-Party Complaint*. The parties respectfully submit that
 2 the foregoing demonstrates that they have not been idle or wasted the additional discovery period
 3 granted by the Court. In fact, as Lakeshore proceeded with repairs during the 2021 Lake Tahoe
 4 building season that Lakeshore determined were necessary, additional site inspections were
 5 conducted by experts for Pulver and Cruz.

6 The parties, through their counsel, continue to communicate among themselves
 7 effectively and endeavor to conduct discovery efficiently. However, the parties agree that a
 8 further extension of the discovery deadlines is necessary due to complications accessing ESI
 9 disclosed by Lakeshore, and the addition of five new parties to this case as third-party defendants.
 10 This is the second request for an extension of the discovery deadlines by the parties, and is
 11 supported by good cause.

12 As this Second Request is made less than 21 days prior to the deadline to Amend
 13 Pleadings and Add Parties, which is scheduled for January 13, 2022, the parties are not requesting
 14 an extension of that deadline, but do request an extension of the remaining discovery deadlines.
 15 This Second Request is made greater than 21 days prior to the expiration of any other discovery
 16 deadline.

17 **II. PERTINENT PROCEDURAL HISTORY**

18 Pulver filed its original *Complaint* in Case No. 3:20-cv-00673-MD-CLB on December 4,
 19 2020, arising from the construction of a multimillion dollar custom house in the Lake Tahoe
 20 basin. [ECF No. 1]. On February 8, 2021, Kanes and Lakeshore filed an *Answer and*
 21 *Counterclaim*. [ECF No. 10]. Lakeshore, only, alleges that Pulver is responsible for various
 22 construction defects in Lakeshore's February 8, 2021 Counterclaim against Pulver Construction.
 23 *Id.* On March 1, 2021, Pulver filed *Counter-Defendant Gary A. Pulver dba Pulver Construction*
 24 *Company's Answer to Lakeshore Boulevard LLC's Counterclaim and Jury Demand*. [ECF. No
 25 12]. On March 15, 2021, Pulver filed *Gary A. Pulver dba Pulver Construction Company's Third-*
 26 *Party Complaint Against Cruz Construction Company, Inc.* [ECF No. 16]. On April 1, 2021,
 27 Cruz Construction filed *Third-Party Defendant Cruz Construction Company, Inc.'s Answer to*
 28 *Third-Party Complaint*. [ECF No. 23].

Prior to Cruz's appearance in this action Pulver, Kanesh, and Lakeshore filed a *Joint Case Management Report* on March 29, 2021. ECF No. 21. Section 8 of that document is entitled "Proposed Firm Dates Pursuant to Local Rule 26-1; Special Scheduling Review Requested" and set forth the initial discovery deadlines as mandated by the Rules. *Id.* pp. 7-8.

On June 14, 2021, the parties filed a *Joint Motion to Extend Discovery Dates [First Request]* [ECF No. 21]. The Court granted the *Joint Motion to Extend Discovery Dates [First Request]* on July 15, 2021. [ECF No. 33], which resulted in the following discovery deadlines:

- a. Discovery Cut-Off: Thursday, May 12, 2022
- b. Amend Pleadings/Add Parties: Thursday, January 13, 2022
- c. FRCP 26(a)(2) Expert Disclosures: Thursday, February 10, 2022
- d. Rebuttal Expert Disclosures: Thursday, March 10, 2022
- e. Dispositive Motions: Thursday, June 23, 2022
- f. Joint Pretrial Order: Monday, July 25, 2022

Pulver filed *Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint* [ECF No. 40], on December 28, 2021, which is supported by a *NRS 40.6884 Affidavit of Merit re Reno Tahoe Geo Associates, Inc. in Support of Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint* executed by Christian L. Moore, Esq. and associated Report of Danny Sommers and Gregory M. Lyman, P.E., of Farr West Engineering [ECF No. 40-1], and *NRS 40.6884 Affidavit of Merit re A&E Architects in Support of Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint* executed by Christian L. Moore, Esq. and associated Report of Dennis P. Govan, AIA, of Govan Associates [ECF No. 4-2].

III. STATEMENT OF SALIENT FACTS

At the time of the first request, the parties had successfully conducted a site inspection, exchanged and responded to initial written discovery, and jointly retained ESI forensic vendor OnlineSecurity to perform technical and consulting services pertaining to electronic discovery. Communications with OnlineSecurity to assist in the voluminous ESI in this case commenced on April 12, 2021 (comprising 91 gigabytes of data which counsel reviewed for relevance and

1 screened for privileged material). The parties have used, and continue to use, the electronic
2 discovery platform Goldfynch for this purpose.

3 Kanes and Lakeshore undertook further investigation and repair work in the months since
4 June 14, 2021, when the parties filed the *Joint Motion to Extend Discovery Dates [First Request]*
5 [ECF No. 21]. This additional investigation led to additional site inspections by retained experts,
6 and was followed by the production of additional documents and photographs by Lakeshore on
7 December 17, 2021.

8 On June 21, 2021, Pulver filed a motion to intervene and consolidate this action with Case
9 No. 3:21-cv-00097 (ECF No. 27), which involved Lakeshore's allegations against A&E
10 Architects, P.C. The Court ultimately granted A&E Architects, P.C.'s Motion to Dismiss in that
11 case [Case No. 3:21-cv-00097, ECF No. 35], and denied Pulver's motion to intervene as moot.
12 *Id.*, at p. 7:9-10.

13 The parties have utilized the jointly developed ESI protocol to produce, process, and
14 review hundreds of thousands of pages of documents in digital format and conducted various
15 expert inspections of the subject real property. Unfortunately, technical issues have prevented
16 Pulver and Cruz from accessing files deposited into the document repository by Lakeshore with
17 its *Second Supplemental FRCP 26(a)(1) Disclosures of Defendant and Counterclaimant 1059*
18 *Lakeshore Boulevard LLC and Defendants Barry Kane and Anna Kane*, on December 17, 2021,
19 which was already understandably delayed due to a personal tragedy experienced by counsel for
20 Lakeshore. The parties are currently collaborating to resolve the inability to access Lakeshore's
21 ESI.

22 In addition, five additional parties have been added as third-party defendants via the filing
23 of *Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint* [ECF
24 No. 40], on December 28, 2021. These parties must be served, answer, and be given suitable
25 opportunity to participate in the discovery process, including; training regarding the eDiscovery
26 protocols and Goldfynch tool, conduct internal review of their documents (including emails) for
27 relevance and privilege, produce initial disclosures, serve and respond to written interrogatories
28 and requests for production, conduct percipient witness depositions, make initial and rebuttal

expert disclosures, and conduct expert witness depositions. The parties requesting this extension have also attempted to reasonably take into account the potential for motion-practice into the deadline dates suggested, below.

IV. LEGAL AUTHORITY

Fed. R. Civ. P. 26(f) requires parties to confer and develop a discovery plan. The parties did so, and developed an initial schedule setting forth stipulated discovery deadlines. See, ECF No. 21. Thereafter, an initial extension of the discovery deadlines became necessary, and was granted upon the parties' joint motion. [ECF No. 33]. Due to developments in the factual and procedural landscape of this case, the parties hereby make a second request for an extension of the discovery deadlines, not including the deadline to amend pleadings or amend parties (January 13, 2022).

LR 26-3 addresses requests for extensions of discovery deadlines and provides, in pertinent part:

A motion or stipulation to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by a showing of good cause for the extension. A motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline... A motion or stipulation to extend a discovery deadline or to reopen discovery must include:

- (a) A statement specifying the discovery completed;
- (b) A specific description of the discovery that remains to be completed;
- (c) The reasons why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan; and
- (d) A proposed schedule for completing all remaining discovery.

LR IA 6-1, referenced in LR 26-3, further requires:

A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted... A request made after the expiration of the specified period will not be granted unless the movant or attorney demonstrates that the failure to file the motion before the deadline expired was the result of excusable neglect. Immediately below the title of the motion or stipulation

there also must be a statement indicating whether it is the first, second, third, etc., requested extension, i.e.:

**STIPULATION TO EXTEND TIME TO FILE MOTIONS
(First Request)**

V. DISCUSSION

The parties have requested, and been granted, one previous extension of the discovery deadlines. Pursuant to Fed. R. Civ. P. 26 and the order of the Court, the operative deadlines in this matter currently are:

- | | | |
|----|-----------------------------------|-----------------------------|
| a. | Discovery Cut-Off: | Thursday, May 12, 2022 |
| b. | Amend Pleadings/Add Parties: | Thursday, January 13, 2022 |
| c. | FRCP 26(a)(2) Expert Disclosures: | Thursday, February 10, 2022 |
| d. | Rebuttal Expert Disclosures: | Thursday, March 10, 2022 |
| e. | Dispositive Motions: | Thursday, June 23, 2022 |
| f. | Joint Pretrial Order: | Monday, July 25, 2022 |

Scheduling Order Granting Motion to Extend Time [ECF No. 33] [ECF No. 33].

The first upcoming deadline contemplated by this Motion is the deadline to amend pleadings or add parties on Thursday, January 13, 2022. As this Second Request is made less than 21 days prior to the deadline to Amend Pleadings and Add Parties, the parties are not requesting an extension of that deadline, but do request an extension of the remaining discovery deadlines. This Second Request is made greater than 21 days prior to the expiration of any other discovery deadline. Therefore, this Second Request is timely pursuant to LR 26-3. As established, below, good cause exists for the requested extension.

1. A statement specifying the discovery completed.

Pulver, Kanes, and Lakeshore have exchanged substantial written discovery, met and conferred over various disagreements in the responses, and reached an accord as to many of the subjects of their disagreements. Pulver, Kanes, Lakeshore, and Cruz and their retained expert witnesses have participated in site-inspections of the subject property. Pulver, Kanes, Lakeshore, and Cruz have also coordinated the retention of a joint electronic discovery technician who has

1 assisted in processing and disclosing the substantial amount of ESI and electronic discovery
2 undertaken to date.

3 The parties have utilized the jointly developed ESI protocol to produce, process, and
4 review hundreds of thousands of pages of documents in digital format and conducted various
5 expert inspections of the subject real property. The information discovered from the extensive
6 document productions and expert site inspections allowed Pulver to retain and consult with
7 qualified experts to receive certificates of merit against the two design professionals named as
8 third-party defendants in *Gary A. Pulver dba Pulver Construction Company's Amended Third-*
9 *Party Complaint*, in addition to three other newly named third-party defendants.

10 2. *A specific description of the discovery that remains to be completed.*

11 Pulver and Cruz have processed (reviewed for privilege and relevance) their own ESI and
12 made corresponding productions. Lakeshore has disclosed some ESI. However, technical issues
13 have prevented Pulver and Cruz from accessing some files deposited into the document
14 repository by Lakeshore with its *Second Supplemental FRCP 26(a)(1) Disclosures of Defendant*
15 *and Counterclaimant 1059 Lakeshore Boulevard LLC and Defendants Barry Kane and Anna*
16 *Kane*, dated December 17, 2021. This disclosure was already understandably delayed due to a
17 personal tragedy experienced by counsel for Lakeshore. The parties are currently collaborating
18 to resolve the inability to access the ESI so that the documents produced by Lakeshore may be
19 viewed by the other parties.

20 In addition, five additional parties have been added as third-party defendants via the filing
21 of *Gary A. Pulver dba Pulver Construction Company's Amended Third-Party Complaint* [ECF
22 No. 40], on December 28, 2021. These parties must be served, answer, and be given suitable
23 opportunity to participate in the discovery process, including; training regarding the eDiscovery
24 protocols and Goldfynch tool, conduct internal review of their documents (including emails) for
25 relevance and privilege, initial disclosures, written interrogatories and requests for production,
26 percipient witness depositions, initial and rebuttal expert disclosures, and expert witness
27 depositions. The parties requesting this extension have also attempted to reasonably take into
28

1 account the potential for motion-practice into the deadline dates suggested in this Second
2 Request.

3 *3. The reasons why the deadline was not satisfied or the remaining discovery was not*
4 *completed within the time limits set by the discovery plan.*

5 Only the deadline to amend pleadings or add parties set by the discovery plan has run,
6 and Pulver timely amended its pleading to name five additional third-party defendants before the
7 deadline. As to the remaining deadlines, this Motion is made proactively to reassess and evaluate
8 the discovery deadlines based on developments in the discovery process. The following tasks
9 must be completed prior to the May 12, 2022 deadline: (1) Access and review currently
10 inaccessible ESI produced by Lakeshore; (2) Serve additional third-party defendants; (3) Allow
11 time for third-party defendants to appear; (4) Initial disclosures by third-party defendants
12 including training regarding Goldfynch platform for production of ESI; (5) Depose percipient
13 witnesses based, to some degree, on the ESI exchanged; (6) Provide data and relevant information
14 to expert witnesses; (7) Produce initial and rebuttal expert reports, and; (8) Take expert
15 depositions.

16 Despite the parties' best efforts and collaborative process, the close of discovery set to
17 occur on May 12, 2022 does not realistically allow sufficient time to complete this outstanding
18 discovery. The parties recognize the reality that there is simply not enough time remaining to
19 complete outstanding discovery based on the large amount of ESI at issue, the present inability
20 to access files produced by Lakeshore, and the addition of five new third-party defendants who
21 will require time to appear and make their own disclosures, and who are entitled to a full and fair
22 opportunity to participate in the discovery process.

23 *4. A proposed schedule for completing all remaining discovery.*

24 The moving parties propose an extension of each deadline by 365 days. This will result
25 in the following proposed deadlines:

- | | | |
|----|--|---------------------------------------|
| 26 | a. Discovery Cut-Off: | Friday, May 12, 2023 |
| 27 | b. Amend Pleadings/Add Parties: | Thursday, January 13, 2022 |
| 28 | c. FRCP 26(a)(2) Expert Disclosures: | Friday, February 10, 2023 |

d. Rebuttal Expert Disclosures: Friday, March 10, 2023
 e. Dispositive Motions: Friday, June 23, 2023
 f. Joint Pretrial Order: Tuesday, July 25, 2023

Importantly, these dates provide sufficient time for disclosure and review of ESI by the additional third-party defendants, percipient witness depositions, initial and rebuttal expert witness disclosures, and depositions of expert witnesses.

VI. CONCLUSION

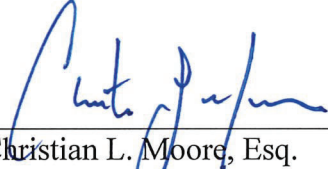
Good cause exists to modify and extend the discovery deadlines set forth in the *Scheduling Order Granting Motion to Extend Time* [ECF No. 33] dated July 15, 2021. Therefore, Pulver, Lakeshore, and Cruz request that the Court grant an extension of the discovery deadlines by 365 days, each, with the exception of the deadline to amend pleadings or add parties.

DATED this 12th day of January, 2022.

and

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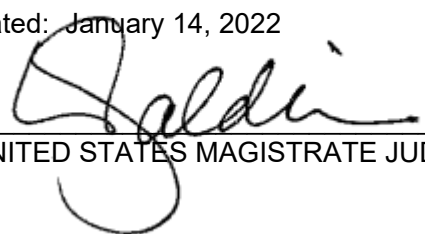
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IT IS SO ORDERED.

Dated: January 14, 2022


 UNITED STATES MAGISTRATE JUDGE

Attorneys for Defendants Barry Kane and

1 *Anna Kane, and Defendant/*
2 *Counterclaimant 1059 Lakeshore*
3 *Boulevard*

4 **Erickson, Thorpe & Swainston, LTD**

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CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b), I certify that I am an employee of LEMONS, GRUNDY & EISENBERG, and that on January 12, 2022, I served a true and correct copy of the **JOINT MOTION TO EXTEND DISCOVERY DATES [Second Request]** on the party(s) set forth below by:

_____ **BY MAIL:** in an envelope with postage thereon fully prepaid to be placed in the U.S. Mail at Reno, Nevada, following ordinary business practices;

_____ **BY E-MAIL:** by transmitting by electronic mail to the respective e-mail addresses;

_____ **BY PERSONAL SERVICE:** in an envelope to be hand delivered this date;

_____ **BY OVERNIGHT DELIVERY:** in an envelope to be delivered to an overnight delivery carrier with delivery fees provided for;

_____ **BY FACSIMILE:** by transmitting by facsimile to the respective fax telephone phone number(s);

 X **BY USING THE COURT'S EFS** which electronically served the following;

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